(4336)

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Alfred T. Kellerhouse, Complainant

vs.

Joyce Kellerhouse, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso on~~ Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said Alfred T. Kellerhouse is forever divorced from the said Joyce Kellerhouse for and on account of Voluntary abandonment

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is further ordered that ~~Alfred T. Kellerhouse~~ the Complainant pay the cost herein to be taxed, for which executed may issue.

This 23rd day of August 1958

Robert M. Hare

Judge Circuit Court, In Equity.

I, _____, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree, rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the 23rd day of August, 1958

_____

Register of Circuit Court, In Equity.

8581—NOTE OF TESTIMONY

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Alfred T. Kellerhouse

Complainant

vs.

~~Joyce Kellerhouse~~

Respondent

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, Answer and Waiver of Respondent, Demand for Oral Examination, Commission to Take Deposition and Testimony of Complainant

and in behalf of Defendant upon Answer

CHASON & STONE

By: Marbourne J. Stone, Jr.

Register.

No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Alfred T. Kellerhouse

VS.

Joyce Kellerhouse

Note of Testimony

Filed in Open Court this 23rd

day of August, 1958.

Alice J. Johnson

Register.

MOORE PRINTING CO., BAY MINETTE, ALA.

ORAL DEPOSITION

Printed by The Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

Alfred T. Kellerhouse COMPLAINANT

vs.

Joyce Kellerhouse RESPONDENT

I, Blanche White

as ~~REGISTRAR~~ Commissioner

have called and caused to come before me Alfred T. Kellerhouse

witness named in the requirement for Oral Examination, on the 23 day of August 19 8, at the office of CHASON & STONE

in Bay Minette, Alabama, and having first sworn said witness to speak the truth, the whole truth, and nothing but the truth, the said Alfred T. Kellerhouse

doth depose and say as follows:

My name is Alfred T. Kellerhouse and I am over the age of twenty-one years and a resident citizen of Syracuse, New York, but I am presently in the Armed Forces of the United States of America, stationed at Fort Lewis, Washington. I am the husband of Joyce Kellerhouse who is also over the age of twenty-one and who is a resident citizen of Baldwin County, Alabama, residing in Bay Minette. We were married on June 1, 1956, in Belton, Texas, but we only lived together as man and wife for one night and day subsequent to our marriage. Since June 2, 1956, my wife and I have not lived together as man and wife and my wife voluntarily abandoned me over a year ago and she has refused to live with me since that time. There were no children born to this marriage.

Alfred T. Kellerhouse
Alfred T. Kellerhouse

ORAL EXAMINATION

Printed by The Baldwin Times

I, Blanche White as ~~Register and~~ Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness ____ and read over to him and he signed the same in the presence of myself and Norborne C. Stone, Jr. at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ____ or had proof made before me of the identity of said witness ____; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 23rd day of August, 19 58

Blanche White (L. S.)

No. ____ Page ____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Alfred T. Kellerhouse
COMPLAINANT

vs.

Joyce Kellerhouse
RESPONDENT

ORAL DEPOSITION

Filed July 23, 19 58
____, Register.

RECORDED IN
Record
Vol. ____ Page ____
____, Register.

Alfred T. Kellerhouse
Complainant
vs.
Joyce Kellerhouse
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

No.

DEMAND FOR ORAL EXAMINATION

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from Bay Minette, , in the County of Baldwin Alabama, the place of trial of said cause, to-wit:

Alfred T. Kellerhouse, the Complainant

2. That said Complainant requires an oral examination of said witnesses before a Commissioner appointed by the Register of this Court.

CHASON & STONE

By: Marbury S. Stone Jr.
Solicitor for Complainant

NOTE:

Complainant suggests the name of Blanche White as a suitable and competent person to act as commissioner upon the examination of said witnesses.

CHASON & STONE

By: Marbury S. Stone Jr.
Solicitor for Complainant.

4336

DEMAND FOR ORAL EXAMINATION

Alfred T. Kellerhouse
Complainant

vs.

Joyce Kellerhouse
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed this _____ day of July

FILED
JUL 23 1958
ALICE J. DUCK, Register

19 58

_____ Register

Moore Printing Co.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Blanche White
Bay Minette, Alabama

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine

Alfred T. Kellerhouse

a witness in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Alfred T. Kellerhouse is

, Complainant

and Joyce Kellerhouse is

Respondent

on oath, to be by you administered, upon Alfred T. Kellerhouse to take and certify the deposition of the witness. and return the same to our Court, with all convenient speed, under your hand.

Witness 23rd day of July, 195 8.

Register.

Commissioner's Fee, $

Witness' Fees, $

No. 4336

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Alfred T. Kellerhouse

Complainant

VS.

Joyce Kellerhouse

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Blanche White

WITNESSES:

Alfred T. Kellerhouse

ALFRED T. KELLERHOUSE,	X	
Complainant,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
JOYCE KELLERHOUSE,	X	IN EQUITY
Respondent.	X	

Comes now the Respondent, Joyce Kellerhouse, in the above styled cause and for answer to the Bill of Complaint filed against her and to each paragraph thereof, says as follows:

She denies the allegations of the Bill of Complaint and demands strict proof thereof.

For further answer to the Bill of Complaint the Respondent does hereby waive notice to her of the filing of said Bill of Complaint or notice of the taking of testimony or submission for final decree and does hereby consent that testimony may be taken in said cause and the same submitted for final decree without further notice to her.

Joyce Kellerhouse
Joyce Kellerhouse

WITNESSES:

James L. Wilson

Ila Quinley

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT _ IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Joyce Kellerhouse to appear and plead, answer or demur, within thirty days from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, In Equity, by Alfred T. Kellerhouse as Complainant, against Joyce Kellerhouse as Respondent.

Witness my hand this the _____day of July, 1958.

_____
Register

ALFRED T. KELLERHOUSE,	X	
Complainant,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
JOYCE KELLERHOUSE,	X	
Respondent.	X	IN EQUITY

TO: THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY AND TO THE HONORABLE HUBERT M. HALL, JUDGE THEREOF:

Comes your Complainant, the undersigned Alfred T. Kellerhouse, and files this his Bill of Complaint for divorce against Joyce Kellerhouse and respectfully represents and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are both over the age of twenty-one years and are of sound mind. That your Complainant is a resident citizen of the State of New York residing in Syracuse, New York, but he is presently a member of the Armed Forces of the United States of America, stationed at Fort Lewis, Washington. That the Respondent is a resident citizen of Baldwin County, Alabama, residing in Bay Minette, Alabama.

SECOND:

That your Complainant and the Respondent were married on

June 1, 1956, in Belton, Texas, and they lived together as man and wife for only one day subsequent to said marriage. That since the marriage of your Complainant to the Respondent, she has voluntarily abandoned your Complainant and has refused to live with him for more than one year next preceding the filing of this Bill of Complaint.

THIRD:

That no children were born to your Complainant and the Respondent as a result of this marriage.

PRAYER FOR PROCESS

The premises considered your Complainant prays that the Respondent Joyce Kellerhouse be made a party to this cause by the usual writ or process of this Honorable Court and that she be required to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this court and the Statutes in such cases made and provided.

PRAYER FOR RELIEF

The premises considered your Complainant respectfully prays that upon a final hearing of this cause that this Honorable Court will grant to your Complainant an absolute divorce from said Respondent and that in and by the terms of said decree that this Honorable Court will allow the Complainant to remarry if he sees fit to do so. And your Complainant prays for such other, further and different relief as in the premises will be meet and proper.

Alfred T. Kellerhouse
Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Norborne C. Stone, Jr., a Notary Public, in and for said County in said State, personally appeared Alfred T. Kellerhouse who is known to me and who, after being by me first duly and legally sworn did depose and say under oath as follows:

That he signed the foregoing complaint and that the facts

alleged therein are true and correct.

Alfred T. Kellerhouse
Alfred T. Kellerhouse

Sworn to and subscribed before me
on this the 22nd day of July, 1958.

Notary Public, Baldwin County, Alabama